

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS, DEL RIO DIVISION

United States of America

vs.

(1) Abraham Michael Sierra
(2) Jessica Lynn Sandoval

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§

CRIMINAL COMPLAINT

CASE NUMBER: DR:22-M -00201(1,2)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about **January 26, 2022** in **Dimmit** county, in the **WESTERN DISTRICT OF TEXAS** defendant(s) did, conspire with and other unnamed co-conspirators, to transport, or move or attempt to transport or move, certain persons, knowing or in reckless disregard of the fact that that such persons were aliens illegally present in the United States, a felony,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(v)(I)

I further state that I am a(n) **Border Patrol Agent** and that this complaint is based on the following facts: *"On January 26, 2022, defendants Abraham Michael Sierra and Jessica Lynn Sandoval, both United States citizens, were arrested near Carrizo Springs, Texas, within the Western District of Texas, for conspiracy to transport two illegal aliens further into the United States. Agents received information from Intel Agents a grey Ford F-150 was suspected of alien smuggling due to driving actions on FM 2644. Agents followed*

Continued on the attached sheet and made a part of hereof.



Sworn to before me and subscribed in my presence,

Signature of Complainant
Melton, Lance T.
Border Patrol Agent

01/31/2022
File Date

at DEL RIO, Texas
City and State

VICTOR ROBERTO GARCIA
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

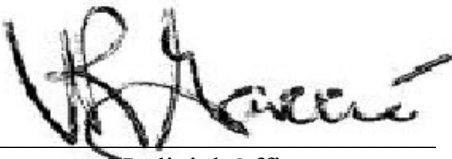
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Continuation of Statement of Facts:

the vehicle and made contact in a local hotel parking lot. Agents determined driver Sierra and passenger Sandoval were United States citizens and two passengers were citizens of Mexico illegally present in the United States. In a sworn statement, Sierra admitted to conspiring with Sandoval to pick illegal aliens on FM 2644 for monetary gain, with the intent to drive the illegal aliens to Houston, Texas. Sandoval invoked her rights and did not provide a statement."



Signature of Judicial Officer



Signature of Complainant